

## IN THE UNITED STATES COURT OF FEDERAL CLAIMS

GORDON D. SONDLAND,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 17-2083C
	)	(Senior Judge Smith)
THE UNITED STATES,	)	
	)	
Defendant.	)	

**DEFENDANT'S WITNESS LIST**

Pursuant to the Court's order dated December 16, 2024, ECF No. 63, the United States respectfully provides this list of witnesses that the United States may call at trial in this action. The listed individuals may or may not be called to testify by the United States. To the extent plaintiff calls a witness listed below to testify during plaintiff's case-in-chief, defendant expects to conduct any direct examination of that witness along with defendant's cross-examination.

The United States reserves the right to alter, amend, or supplement this witness list for any appropriate reason. The United States further reserves the right to call any witness needed to provide the foundation needed to admit an exhibit listed on the Government's exhibit list or any joint exhibit list.

1. Michael R. Pompeo, former United States Secretary of State. Secretary Pompeo can be contacted through counsel, Willam Burck, at (202) 538-8120 or williamburck@quinnmanuel.com. Secretary Pompeo is expected to testify regarding his communications with Ambassador Sondland and Ambassador Sondland's representatives, including concerning legal fees for which Ambassador Sondland sought reimbursement, allegedly incurred in connection with the 2019 impeachment inquiry relating to President Trump. Pompeo is also expected to testify regarding the State Department's program for reimbursing employees who incurred fees in connection with the impeachment inquiry, his involvement in

that program, any general involvement in agency contracting, and about State's involvement in the representation of individuals called to provide information in the impeachment inquiry.

2. Brian Bulatao, former Under Secretary for Management, U.S. Department of State. Defendant's counsel will provide plaintiff's counsel with Mr. Bulatao's personal contact information upon request. Mr. Bulatao is expected to testify regarding his communications with Ambassador Sondland and Ambassador Sondland's representatives, including concerning the legal fees for which Ambassador Sondland sought reimbursement, allegedly incurred in connection with the impeachment inquiry. Mr. Bulatao is also expected to testify regarding the State Department's program for reimbursing employees who incurred fees in connection with the impeachment inquiry, including his involvement in that program, any general involvement in agency contracting, and about State's involvement in the representation of individuals called to provide information in the impeachment inquiry.

3. Ulrich Brechbuhl, former Counselor to the Secretary of State. Defendant's counsel will provide plaintiff's counsel with Mr. Brechbuhl's personal contact information upon request. Mr. Brechbuhl may be called to testify regarding his communications with Ambassador Sondland and Ambassador Sondland's representatives, including concerning the legal fees for which Ambassador Sondland sought reimbursement, allegedly incurred in connection with the impeachment inquiry. Mr. Brechbuhl may also be called to testify regarding the State Department's program for reimbursing employees who incurred fees in connection with the impeachment inquiry, including his involvement in that program, any general involvement in agency contracting, and about State's involvement in the representation of individuals called to provide information in the impeachment inquiry.

4. Gordon Sondland, former United States Ambassador to the European Union. Ambassador Sondland can be contacted through plaintiff's counsel. Ambassador Sondland is expected to testify regarding his testimony to Congress and his preparations for same, the legal fees he incurred in relation to that testimony, his requests for reimbursement of fees allegedly incurred, and any other amounts sought by Ambassador Sondland as damages in this matter.

5. Robert Luskin, Paul Hastings LLP. Mr. Luskin can be contacted through plaintiff's counsel. Mr. Luskin is expected to testify regarding Ambassador Sondland's testimony to Congress and his preparations for same, the legal fees Ambassador Sondland incurred in relation to that testimony, Ambassador Sondland's requests for reimbursement of fees allegedly incurred, and any other amounts sought by Ambassador Sondland as damages in this matter.

6. Kwame J. Manley, Paul Hastings LLP. Mr. Manley can be contacted through plaintiff's counsel. Mr. Manley is expected to testify regarding Ambassador Sondland's testimony to Congress and his preparations for same, the legal fees Ambassador Sondland incurred in relation to that testimony, Ambassador Sondland's requests for reimbursement of fees allegedly incurred, and any other amounts sought by Ambassador Sondland as damages in this matter.

7. James McDermott, McDermott Weaver Connelly Clifford LLP. Mr. McDermott can be contacted through plaintiff's counsel. Mr. McDermott is expected to testify regarding Ambassador Sondland's testimony to Congress and his preparations for same, the legal fees Ambassador Sondland incurred in relation to that testimony, Ambassador Sondland's requests for reimbursement of fees allegedly incurred, and any other amounts sought by Ambassador Sondland as damages in this matter.

8. Any witnesses designated by the plaintiff in this action.

Respectfully submitted,

BRETT A. SHUMATE  
Acting Assistant Attorney General

PATRICIA M. McCARTHY  
Director

/s/Steven J. Gillingham  
STEVEN J. GILLINGHAM  
Assistant Director

/s/William J. Grimaldi  
WILLIAM J. GRIMALDI  
Assistant Director  
GEOFFREY M. LONG  
Senior Trial Counsel  
JOSHUA D. TULLY  
CATHERINE M. YANG  
Trial Attorneys  
Commercial Litigation Branch  
Civil Division, Department of Justice  
P.O. Box 480  
Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 616-0471  
E-mail: william.j.grimaldi@usdoj.gov

OF COUNSEL:

MICHAEL ZUBROW  
Attorney-Adviser, L/M  
Office of the Legal Adviser  
U.S. Department of State

February 3, 2025

Attorneys for Defendant